

CHAITMAN LLP

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Settlement Date: March 7, 2019 at 12:00 p.m.

Objection Deadline: March 5, 2019 at 5:00 p.m.

*Attorneys for Defendants on Exhibit A
annexed to the Proposed Order*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A
ANNEXED TO THE PROPOSED ORDER,

Defendants.

Adv. Pro. Nos. on Exhibit A
annexed to the Proposed Order

NOTICE OF SETTLEMENT OF ORDER

PLEASE TAKE NOTICE that pursuant to Local Rule 9074-1, in connection with the
adversary proceedings listed on Exhibit A annexed to the Proposed Order (the “Proposed Order”),

and pursuant to the Court's February 15, 2019 Memorandum Decision granting in part and denying in part the Trustee's Motion For Limited Additional Discovery Based on Prior Orders Authorizing Deposition of Bernard L. Madoff, [ECF No. 18480], which Memorandum Decision lifted the stay on the Subpoenas served by Chaitman LLP on certain employees of BLMIS, specifically holding that "the Chaitman Defendants may now proceed with those subpoenas to the extent they were timely served," [ECF No. 18480 at 10, n.7], the undersigned counsel for Defendants listed on **Exhibit A** annexed to the Proposed Order, attached hereto as **Exhibit 1** (the "Proposed Order"), will present the attached Proposed Order to the Honorable Stuart M. Bernstein, U.S.B.J., for settlement and signature in his chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, 10004 on **March 7, 2019 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that any counter-proposed order or objection to the Proposed Order must be in writing and filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, 10004, by no later than March 5, 2019 at 5:00 p.m. (the "Objection Deadline"), with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein, U.S.B.J., and served upon Chaitman LLP, counsel for Defendants listed on Exhibit A annexed to the Proposed Order. Any objections to the Proposed Order must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed order or written objection to the Proposed Order is received before the objection deadline, the Proposed Order may be signed and entered by the Court without further notice.

Respectfully submitted,

Dated: New York, New York
February 28, 2019

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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*Attorneys for Defendants on Exhibit
A annexed to the Proposed Order*